

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

MAX MINDS, LLC,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	Case No.: 1:24-cv-00779-JPH-MG
	)	
TRIANGLE EXPERIENCE GROUP, INC., <i>et al.</i> ,	)	
	)	
<i>Defendants.</i>	)	

**SEALED APPENDIX OF EXHIBITS IN SUPPORT OF  
TRIANGLE EXPERIENCE GROUP, INC.'S BRIEF IN OPPOSITION TO  
THE AMENDED MOTION FOR PRELIMINARY INJUNCTION**

Defendant Triangle Experience Group, Inc. respectfully submits the following sealed exhibits in support of its Brief in Opposition to the Amended Motion for Preliminary Injunction:

<b><u>Description</u></b>	<b><u>Exhibit</u></b>
---------------------------	-----------------------

Declaration of [REDACTED]	..... A
---------------------------	---------

Declaration of Janna Clare .....	B
----------------------------------	---

- Exhibit 1 - Max Invoice TEG2001
- Exhibit 2 - Max Invoice TEG2003
- Exhibit 3 - Max Invoice TEG2005
- Exhibit 4 - Max Invoice TEG2006
- Exhibit 5 - Max Invoice TEG2008
- Exhibit 6 - Invoice TEG2007
- Exhibit 7 - Invoice TEG2004
- Exhibit 8 - Invoice T2004-1
- Exhibit 9 - Invoice T2004-2
- Exhibit 10 - Max Invoice 2120
- Exhibit 11 - Invoice 2144
- Exhibit 12 - Invoice 2146
- Exhibit 13 - Invoice 2152
- Exhibit 14 - Invoice 2154
- Exhibit 15 - Invoice 2157
- Exhibit 16 - Invoice 2155
- Exhibit 17 - Invoice 2166
- Exhibit 18 - Invoice 2167

Exhibit 19 - Invoice 2172  
Exhibit 20 - Invoice 2173  
Exhibit 21 - Invoice 2174  
Exhibit 22 - Invoice 2175  
Exhibit 23 - Invoice 2178  
Exhibit 24 - Invoice 2179  
Exhibit 25 - Max Invoice TEG2010  
Exhibit 26 - Max Invoice TEG2011  
Exhibit 27 - Max Invoice 2122  
Exhibit 28 - Max Invoice 2133  
Exhibit 29 - Max Invoice 2134  
Exhibit 30 - Max Invoice 2137  
Exhibit 31 - Invoice 2147

Declaration of Robert E. Clare ..... C1

Exhibit 1 - Email dated April 7, 2017  
Exhibit 2 - Email dated February 6, 2017  
Exhibit 3 - Email dated February 10, 2017  
Exhibit 4 - Email dated April 4, 2018  
Exhibit 5 - Email dated May 23, 2018  
Exhibit 6 - June 18, 2018 [REDACTED]  
Exhibit 7 - Emails dated June 6, 2019 and July 2, 2019  
Exhibit 8 - Non-Disclosure Agreement dated July 17, 2019  
Exhibit 9 - Email dated July 15, 2019  
Exhibit 10 - [REDACTED]  
Exhibit 11 - Email dated July 18, 2019  
Exhibit 12 - Joint Venture Agreement  
Exhibit 13 - Slack messages from 2020  
Exhibit 14 - Email dated January 30, 2020  
Exhibit 15 - Email dated January 31, 2020  
Exhibit 16 - Haptic Federal Test Plan spreadsheet  
Exhibit 17 - [REDACTED]  
Exhibit 18 - [REDACTED]  
Exhibit 19 - Emails dated July 8, 2021 and July 9, 2021  
Exhibit 20 - Emails  
Exhibit 21 - Email dated September 4, 2022  
Exhibit 22 - Emails  
Exhibit 23 - [REDACTED]  
Exhibit 24 - [REDACTED]  
Exhibit 25 - Scorecard  
Exhibit 26 - Emails dated March 11, 2020  
Exhibit 27 - Email dated March 12, 2020  
Exhibit 28 - Email thread  
Exhibit 29 - Email dated July 23, 2020  
Exhibit 30 - Email dated June 4, 2020  
Exhibit 31 - Emails dated July 1, 2020 and attachments TEG00006627

Declaration of Robert E. Clare .....	C2
Exhibit 31 - Emails dated July 1, 2020 and [REDACTED]	
Declaration of Robert E. Clare .....	C3
Exhibit 31 - [REDACTED]	
Declaration of Robert E. Clare .....	C4
Exhibit 31 - [REDACTED]	
Exhibit 32 - Email dated May 1, 2021	
Exhibit 33 - Email dated June 6, 2021	
Exhibit 34 - [REDACTED]	
Exhibit 35 - Email dated April 4, 2023	
Exhibit 36 - Email dated March 31, 2021	
Exhibit 37 - SCLA Exhibit A	
Exhibit 38 - SCLA Letter dated August 25, 2023	
Exhibit 39 - Email dated June 7, 2020	
Exhibit 40 - Email	
Declaration of Kevin Mullican.....	D
Exhibit 1 – [REDACTED]	
Expert Report of Nick Ferrara.....	E

Dated: January 31, 2025

Respectfully submitted,

Alexander P. Orlowski, Atty. No. 30794-29  
Amanda Jane Gallagher, Atty. No. 32662-79

**BARNES & THORNBURG LLP**

11 South Meridian Street

Indianapolis, IN 46204

Tel: (317) 566-1110

Fax: (317) 636-1507

[alexander.orkowski@btlaw.com](mailto:alexander.orkowski@btlaw.com)

[amanda.gallagher@btlaw.com](mailto:amanda.gallagher@btlaw.com)

/s/ Richard D. Kelley

Richard D. Kelley, *admitted pro hac vice*

Samuel J. Banks, *admitted pro hac vice*

Kandis M. Koustenis, *admitted pro hac vice*

**BEAN KINNEY & KORMAN, PC**

2311 Wilson Boulevard, Suite 500

Arlington, VA 22201

Tel: (703) 525-4000

Fax: (703) 525-2207

[rkelly@beankinney.com](mailto:rkelly@beankinney.com)

[sbanks@beankinney.com](mailto:sbanks@beankinney.com)

[kkoustenis@beankinney.com](mailto:kkoustenis@beankinney.com)

Heather J. Kliebenstein, *admitted pro hac vice*

**MERCHANT & GOULD**

150 South Fifth Street, Suite 2200

Minneapolis, MN 55402

Tel: (612) 332-5300

Fax: (612) 332-9081

[hkliebenstein@merchantgould.com](mailto:hkliebenstein@merchantgould.com)

*Counsel for Triangle Experience Group, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2025, a copy of the foregoing document was filed electronically using the CM/ECF system, which will send notification of such filing (NEF) to counsel of record.

/s/ Samuel J. Banks